

Virginia Title V Operating Permit

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1, of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act and 9 VAC 5-80-50 through 9 VAC 5-80-300 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name:	Georgia-Pacific Wood Products LLC
Facility Name:	Georgia-Pacific Wood Products LLC
Facility Location:	234 Forest Road; Skippers, Virginia
Registration Number:	50941
Permit Number:	PRO50941

This permit includes the following programs:

Federally Enforceable Requirements - Clean Air Act (Sections I through XI)

July 27, 2011
Effective Date

July 27, 2016
Expiration Date

Deputy Regional Director

Signature Date

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Permit Conditions, 43 pages
CAM Plans, 12 pages

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I. Facility Information

Permittee/Facility

Georgia-Pacific Wood Products LLC - Skippers OSB

P.O. Box 309

Skippers, VA 23879

Responsible Official

Jerry Brown

Plant Manager

(434) 634-6133

Contact Person

Ronnie Sweet

Environmental Coordinator

(434) 634-6133

County-Plant Identification Number: 081-0037

Facility Description:

The facility is an oriented strand board (OSB) manufacturing facility (SIC 2493/NAICS 321219 – reconstituted wood product manufacturing) which is owned and operated by Georgia-Pacific Wood Products LLC. The OSB manufacturing operations include log debarking, log flaking, wood chipping, flake drying, blending, mat forming, board pressing, sanding, trimming, edge seal coating, and woodwaste handling operations.

II. Emissions Units

Equipment to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
1000/1350	11	Chipper/green chip handling system	1.8 dry tons/hr	Classic Systems - 5' diameter cyclone	CYC-1	PM/PM-10	February 5, 2009
1100	Fugitive	Log preparation area	225 tons/hr	None	N/A	N/A	February 5, 2009
1200	Fugitive	Log debarking	225 tons/hr	None	N/A	N/A	February 5, 2009
1300	Fugitive	Block preparation area	225 tons/hr	None	N/A	N/A	February 5, 2009
3000	52A & B	<u>Wellons/flake dryer system</u> a. One Wellons 4-cell wood fuel combustion system (primary flake dryers) b. One Wellons 1-cell wood fuel combustion system (primary thermal oil heater) c. One MEC dry fuel burner (dedicated to dryers) d. One natural gas burner (dedicated thermal oil heater backup) e. One natural gas burner (dedicated MEC burner backup) f. Four flake dryers (#1-4)	a. 160×10^6 BTU/hr heat input b. 50×10^6 BTU/hr heat input c. 50×10^6 BTU/hr heat input d. 50×10^6 BTU/hr heat input e. 50×10^6 BTU/hr heat input f. 50 dry tons/hr, input (combined)	Four multiclones (one per flake dryer) Two Smith Engineering Company 8-canister direct flame regenerative thermal oxidizers (RTO)	N/A RTO 1-2	PM/PM-10 VOC, CO, PM/PM-10	February 5, 2009

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
3100	15	Screen fines transfer system	5.0 dry tons/hr	Pneumafil – 6.5-92-10 fabric filter	BH-6	PM/PM-10	February 5, 2009
3200	16	Dry waste transfer system	3.8 dry tons/hr	Pneumafil – 6.5-92-10 fabric filter	BH-5	PM/PM-10	February 5, 2009
3300	18	Sanderdust/hog fuel storage/transfer system	15.1 dry tons/hr	Pneumafil – 6.5-92-10 fabric filter	BH-8	PM/PM-10	February 5, 2009
3400	19	Grit fines transfer system	0.8 dry tons/hr	MAC 72 – MCF 22 fabric filter	BH-9	PM/PM-10	February 5, 2009
3500	20	Fuel screen fines storage bin/MEC raw fuel transfer system	10.5 dry tons/hr	MAC 72 – AVR 52 fabric filter	BH-10	PM/PM-10	February 5, 2009
3600	21	Dry fuel hammermill/MEC prepared fuel transfer system	11.5 dry tons/hr	MAC 144 – AVR 153 fabric filter	BH-11	PM/PM-10	February 5, 2009
4000	Fugitive	Dry flake storage/conveying/blending system including five (5) blenders	44.0 dry tons/hr	None	N/A	N/A	February 5, 2009
5000	54	Board press	40 dry tons/hr	Regenerative Catalytic/Thermal Oxidizer	RCO/R TO-1	VOC, CO, PM/PM-10	February 5, 2009
5100	13	Forming & finishing end pickups system	44.0 dry tons/hr	Pneumafil – 11.5-316-10 fabric filter	BH-1	PM/PM-10	February 5, 2009
5200	17	Mat reject system	2.1 dry tons/hr	Pneumafil – 13.5-448-10 fabric filter	BH-7	PM/PM-10	February 5, 2009
6100	12	Panel sanding/tongue & groove system	22.7 dry tons/hr	Pneumafil – 13.5-448-10 fabric filter	BH-4	PM/PM-10	February 5, 2009
6200	7-345	Edge seal spray booth	10.0 gal/hr	Wash water filter	WW-1	PM/PM-10	February 5, 2009
9100	14a	General plant dedusting - system A	0.1 dry tons/hr	Pneumafil – 13.5-448-10 fabric filter	BH-2	PM/PM-10	February 5, 2009
9200	14b	General plant dedusting - system B	0.1 dry tons/hr	Pneumafil – 13.5-358-10 fabric filter	BH-3	PM/PM-10	February 5, 2009
D027	D027	Fire pump emergency generator	208 hp	None	N/A	N/A	N/A
D029	D029	Emergency generator	465 hp	None	N/A	N/A	N/A

Note: The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

III. Process Unit Requirements

A. Wellons/Flake Dryer System (Ref. #3000)

Limitations

1. Particulate Matter (PM) and PM-10 emissions from the Wellons/flake dryer system (Ref. #3000) shall be controlled by a multiclone on each flake dryer with the flake dryer exhaust combining in a common settling chamber (16 feet x 50 feet) followed in series by a regenerative thermal oxidation system (RTO). The multiclones, settling chamber, and RTO shall be provided with adequate access for inspection. An annual internal inspection shall be conducted on each multiclone and on the settling chamber by the permittee to insure structural integrity. (9 VAC 5-80-110 and Condition #4 of the February 5, 2009 NSR permit)
2. Carbon Monoxide (CO) and Formaldehyde emissions from the Wellons/flake dryer system (Ref. #3000) shall be controlled by a regenerative thermal oxidation (RTO) system. The RTO shall be provided with adequate access for inspection. (9 VAC 5-80-110 and Condition #5 of the February 5, 2009 NSR permit)
3. Volatile Organic Compound (VOC) emissions from the Wellons/flake dryer system (Ref. #3000) shall be captured and controlled by a RTO. The RTO shall be provided with adequate access for inspection. The RTO shall achieve a minimum Volatile Organic Compound destruction efficiency of 90% for the captured Volatile Organic Compound emissions. The 90% destruction efficiency shall be maintained at all times except during periods when the dryers are not operating or during previously scheduled startup and shutdown periods (including bakeouts and washouts). These startup and shutdown periods shall not exceed the minimum amount of time necessary for these events, and during these events, the permittee shall minimize emissions to the greatest extent practicable. Whenever possible, startup and shutdown of control technology systems shall be scheduled during times when process equipment is also shut down for routine maintenance. (9 VAC 5-80-110 and Condition #6 of the February 5, 2009 NSR permit)
4. The approved fuel for the Wellons/flake dryer system (Ref. #3000) is woodwaste. "Woodwaste" is defined as wood feed stock, bark, resinated and unresinated sawdust, sanderdust, dry waste, finished board trimmings, residual wood fiber recovered from settling ponds at G-P's Jarratt, Virginia Softboard Sheathing Mill and other wood wastes capable of being hogged. This definition does not include wood contaminated with paints, plastics, finishing material, other foreign materials which might emit toxic air pollutants when burned, or other chemical treatments, except the woodwaste may contain small quantities of edge seal spray paint, resins and waxes from the flake blending area, equipment washdown oil, and oil contaminated spill cleanup material generated at the permitted facility. The woodwaste may also contain small quantities of fuel oil for use during burner startup. A change in the fuel may require a permit to modify and operate. (9 VAC 5-80-110 and Condition #14 of the February 5, 2009 NSR permit)
5. The approved fuel for the backup burners to the Wellons/flake dryer system (Ref. #3000) is natural gas. A change in the fuel may require a permit to modify and operate. (9 VAC 5-80-110 and Condition #15 of the February 5, 2009 NSR permit)
6. The Wellons/flake dryer system (Ref. #3000) shall consume (as fuel) no more than 241,268 dry tons of woodwaste per year, calculated as the sum of each consecutive 12-month period (i.e. the 12-month rolling total). (9 VAC 5-80-110 and Condition #17 of the February 5, 2009 NSR permit)

7. The Wellons/flake dryer system (Ref. #3000) shall process no more than 325,000 dry tons of wood flakes per year, calculated as the sum of each consecutive 12-month period (i.e. the 12-month rolling total).
(9 VAC 5-80-110 and Condition #18 of the February 5, 2009 NSR permit)
8. The total emissions from the operation of the Wellons/flake dryer system (Ref. #3000), exhausting through the RTOs, shall not exceed the limits specified below:

Pollutants	lbs/hr	tons/yr
Particulate Matter	23.1	74.9
PM-10	23.1	74.9
Sulfur Dioxide	6.7	24.1
Nitrogen Oxides	48.5	157.5
Carbon Monoxide	20.6	66.8
Volatile Organic Compounds	17.3	56.4

(9 VAC 5-80-110 and Condition #31 of the February 5, 2009 NSR permit)

9. Visible emissions from the Wellons/flake dryer system (Ref. #3000), exhausting through the RTOs, shall not exceed 20 percent opacity (6-minute average), except for one 6-minute period per hour during which visible emissions shall not exceed 30 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during periods when the dryers are not operating or during previously scheduled startup and shutdown periods (including bakeouts and washouts), and during periods of malfunction.
(9 VAC 5-80-110 and Condition #37 of the February 5, 2009 NSR permit)

Monitoring/Testing/Recordkeeping

10. Subsequent performance tests shall be conducted for Volatile Organic Compounds from the RTO stacks controlling emissions from the Wellons/flake dryer system (Ref. #3000) at least biennially to determine compliance with the destruction efficiency requirement contained in Condition #3. Tests shall be conducted and reported and the data shall be reduced as set forth in 9 VAC 5-50-30, and the test methods and procedures contained in each applicable section or subpart listed in 9 VAC 5-50-410. The details of the tests are to be arranged with the Director, Piedmont Regional Office. The permittee shall submit a test protocol at least 30 days prior to testing. Two copies of the test results shall be submitted to the Director, Piedmont Regional Office within 45 days after test completion and shall conform to the test report format enclosed with the February 5, 2009 NSR permit unless another report format is approved by the Director, Piedmont Regional Office prior to report submittal.
(9 VAC 5-80-110 and Condition #26 of the February 5, 2009 NSR permit)
11. Continuous monitors shall be installed to measure and record, except during periods when the dryers are not operating or during previously scheduled startup and shutdown periods (including bakeouts and washouts), the retention chamber temperatures (same as firebox temperature for 40 CFR 63 Subpart DDDD purposes), outlet volumetric flows, ID fan inlet static pressures, and the isolation damper positions of each RTO controlling emissions from the Wellons/flake dryer system (Ref. #3000). The monitors shall be maintained and calibrated in accordance with their manufacturers' recommendations. The retention chamber temperature (same as firebox temperature for 40 CFR 63 Subpart DDDD purposes) and outlet volumetric flow monitors shall record readings every 15 minutes and reduce these readings to 12-hour averages. The ID fan

inlet static pressure monitors shall record readings 15 minutes and reduce these readings to 12-hour averages. The isolation damper position monitors shall record readings when a change of damper position occurs.

(9 VAC 5-80-110 and Condition #8 of the February 5, 2009 NSR permit)

12. Each RTO exhaust (Stack ID #52A & B) shall be observed visually at least once each operating week for at least a brief time period to determine if the RTO exhausts have normal visible emissions (does not include condensed water vapor/steam), unless a 40 CFR 60 Appendix A Method 9 visible emissions evaluation is performed on the emissions unit. Each emissions unit observed having above-normal visible emissions shall be followed up with a 40 CFR 60 Appendix A Method 9 visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible and recorded, and the cause and corrective measures taken are recorded.
(9 VAC 5-80-110)
13. The permittee shall implement an approved Compliance Assurance Monitoring (CAM) Plan to monitor the RTO system controlling PM/PM-10, VOC and CO from the Wellons/flake dryer system (Ref. #3000). For the purposes of this permit, PM/PM-10 from the Wellons/flake dryer system is referred to as "PSEU A", CO from the Wellons/flake dryer system is referred to as "PSEU B" and VOC from the Wellons/flake dryer system is referred to as "PSEU C"; with the acronym PSEU standing for Pollutant Specific Emissions Unit. The approved monitoring plan shall be the attached CAM Plan (Attachment A) or the most recent revision to that plan that has been: (1) developed and approved pursuant to 40 CFR 64.7(e) and Section VI of this permit; (2) revised pursuant to a Quality Improvement Plan in accordance with 40 CFR 64.8 and Section VI of this permit; or (3) otherwise approved by the DEQ conforming with Section VI of this permit, including, but not limited to, changes initiated by DEQ. See Section VI of this permit for additional CAM requirements for PSEU A, PSEU B and PSEU C including their Quality Improvement Plan thresholds.
(9 VAC 5-80-110 and 40 CFR 64.6(c))
14. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, Piedmont Regional Office. These records shall include, but are not limited to:
 - a. The yearly throughput of woodwaste (in dry tons) to the Wellons/flake dryer system (Ref. #3000) as fuel, calculated as the sum of each consecutive 12-month period (i.e. the 12-month rolling total).
 - b. The yearly throughput of wood flakes (in dry tons) to the Wellons/flake dryer system (Ref. #3000), calculated as the sum of each consecutive 12-month period (i.e. the 12-month rolling total).
 - c. The results of the annual structural integrity inspections of the multiclones and settling chamber required by Condition #1 and details of any corrective action taken as a result of these inspections.
 - d. Records of the emission factors used to calculate the emissions of each pollutant with an emission limitation in Condition #8.
 - e. Records and results of the performance tests required by Condition #10.
 - f. The results of the weekly visible emission inspections of the RTO exhausts required by Condition #12 and details of any corrective action taken as a result of these inspections.

- g. The data recorded by the continuous monitors required by Condition #11 and calibration and maintenance records for each such monitor.

These records shall be maintained on-site and made available for inspection by the DEQ and shall be current for the most recent five years.

(9 VAC 5-80-110 and Condition #41 of the February 5, 2009 NSR permit)

Reporting

15. The permittee shall report the results of any 40 CFR Part 60 Method 9 opacity test performed as a result of Condition #12. If the test indicates the facility is out of compliance with the standard contained in Condition #9, the source shall also report the length of time associated with any exceedance of the standard and the corrective actions taken to correct the exceedance. This report shall be sent to the Director, Piedmont Regional Office.
(9 VAC 5-80-110)
16. The permittee shall report the records of any continuous monitor data, required by Condition #11, that demonstrates that the retention chamber temperature (same as firebox temperature for 40 CFR 63 Subpart DDDD purposes), as a 12-hour average, of any RTO dropped below 1500 °F or that the total outlet volumetric flow, as a 12-hour average, of the two RTOs combined exceeded 205,500 scfm or the highest air flow recorded during the most recent successful compliance demonstration, whichever is greater, except during periods when the dryers are not operating or during previously scheduled startup and shutdown periods (including bakeouts and washouts). The permittee shall also report the length of time associated with any such event and the corrective actions taken to return the RTOs to normal operating conditions. This report shall be sent to the Director, Piedmont Regional Office.
(9 VAC 5-80-110 and Condition #42 of the February 5, 2009 NSR permit)

Plywood and Composite Wood Products (PCWP) MACT

17. See Section IV of this permit for PCWP MACT requirements for the Wellons/flake dryer system (Ref. #3000).
(9 VAC 5-80-110 and 40 CFR 63 Subpart DDDD)

B. Board Press (Ref. #5000)

Limitations

18. Volatile Organic Compound emissions from the board press (Ref. #5000) shall be captured and controlled by a regenerative catalytic/regenerative thermal oxidizer (RCO/RTO-1) system. The RCO/RTO system shall be provided with adequate access for inspection. The RCO/RTO system shall operate either in RCO mode or RTO mode. In both modes, the RCO/RTO system shall achieve a minimum Volatile Organic Compound destruction efficiency of 90% for the captured Volatile Organic Compound emissions. The 90% destruction efficiency shall be maintained at all times except during periods when the board press is not operating or during previously scheduled startup and shutdown periods (including bakeouts and washouts). These startup and shutdown periods shall not exceed the minimum amount of time necessary for these events, and during these events, the permittee shall minimize emissions to the greatest extent practicable. Whenever possible, startup and shutdown of control technology systems shall be scheduled during times when process equipment is also shut down for routine maintenance.
(9 VAC 5-80-110 and Condition #7 of the February 5, 2009 NSR permit)
19. The board press (Ref. #5000) shall process no more than 280,000 dry tons of wood flakes per year, calculated as the sum of each consecutive 12-month period (i.e. the 12-month rolling total).
(9 VAC 5-80-110 and Condition #19 of the February 5, 2009 NSR permit)
20. Emissions from the operation of the board press (Ref. #5000), exhausting through the RCO/RTO system, shall not exceed the limits specified below:

Pollutants	lbs/hr	tons/yr
Particulate Matter	4.0	14.0
PM-10	4.0	14.0
Nitrogen Oxides	10.3	36.0
Carbon Monoxide	23.4	82.0
Volatile Organic Compounds	10.3	36.0

(9 VAC 5-80-110 and Condition #32 of the February 5, 2009 NSR permit)

21. Visible emissions from the board press (Ref. #5000), exhausting through the RCO/RTO system, shall not exceed 10 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during periods when the board press is not operating or during previously scheduled startup and shutdown periods (including bakeouts and washouts), and during periods of malfunction.
(9 VAC 5-80-110 and Condition #38 of the February 5, 2009 NSR permit)

Monitoring/Recordkeeping

22. Initial performance tests shall be conducted for Particulate Matter, Nitrogen Oxides and Carbon Monoxide from the RCO/RTO system stack (Stack ID #54) to determine compliance with the emission limits contained in Condition #20. Tests shall be conducted and reported and the data shall be reduced as set forth in 9 VAC 5-50-30, and the test methods and procedures contained in each applicable section or subpart listed in 9 VAC 5-50-410. The details of the tests are to be arranged with the Director, Piedmont Regional Office. The permittee shall submit a test protocol at least 30 days prior to testing. Two copies of the test results shall be submitted to the Director,

Piedmont Regional Office within 45 days after test completion and shall conform to the test report format enclosed with this permit.
(9 VAC 5-80-110 and Condition #23 of the February 5, 2009 NSR permit)

23. Initial performance tests shall be conducted for Volatile Organic Compounds from the RCO/RTO system stack (Stack ID #54) to determine compliance with the emission limits contained in Condition #20. At the same time, performance tests shall be conducted for Volatile Organic Compounds at the inlet of the RCO/RTO system, and the destruction efficiency shall be calculated from the test results. Tests shall be conducted and reported and the data shall be reduced as set forth in 9 VAC 5-50-30, and the test methods and procedures contained in each applicable section or subpart listed in 9 VAC 5-50-410. The details of the tests are to be arranged with the Director, Piedmont Regional Office. The permittee shall submit a test protocol at least 30 days prior to testing. Two copies of the test results shall be submitted to the Director, Piedmont Regional Office within 45 days after test completion and shall conform to the test report format enclosed with this permit unless another report format is approved by the Director, Piedmont Regional Office prior to report submittal.
(9 VAC 5-80-110 and Condition #24 of the February 5, 2009 NSR permit)
24. Concurrently with the initial performance tests, Visible Emission Evaluations (VEEs) in accordance with 40 CFR, Part 60, Appendix A, Method 9, shall be conducted on the RCO/RTO system stack (Stack ID #54). The details of the tests are to be arranged with Director, Piedmont Regional Office. The permittee shall submit a test protocol at least 30 days prior to testing. Should conditions prevent concurrent opacity observations, the Director, Piedmont Regional Office shall be notified in writing, within seven days, and visible emissions testing shall be rescheduled within 30 days. Rescheduled testing shall be conducted under the same conditions (as possible) as the initial performance tests. Two copies of the test results shall be submitted to the Director, Piedmont Regional Office within 45 days after test completion and shall conform to the test report format enclosed with this permit.
(9 VAC 5-80-110 and Condition #25 of the February 5, 2009 NSR permit)
25. The initial performance tests required by Conditions #22-24 shall be performed for the RTO mode of the RCO/RTO system within 60 days of start-up of the RCO/RTO system in RTO mode. Note: the initial performance tests for the RCO mode of system operation were completed in November 2008 and reported on December 22, 2008.
(9 VAC 5-80-110 and Condition #28 of the February 5, 2009 NSR permit)
26. For the RCO/RTO system (Ref. #5000, Stack ID #54), the permittee shall install, operate and maintain continuous temperature monitors meeting the requirements of 40 CFR 63.2269(a-b) and 63.2270 to measure and record, except during periods when the board press is not operating or during previously scheduled startup and shutdown periods (including bakeouts and washouts), the RCO/RTO firebox temperatures when operating in RTO mode and the RCO/RTO combustion chamber temperature when operating in RCO mode.
(9 VAC 5-80-110 and Condition #9 of the February 5, 2009 NSR permit)
27. In accordance with 40 CFR 63.2262, the permittee shall establish the minimum firebox temperature for the RTO/RCO system during the initial performance tests required by Conditions #23 and #25. When operating in RCO mode, the permittee shall operate the RCO/RTO system with a minimum combustion chamber temperature of 700 °F. Prior to the initial performance tests required by Conditions #23 and #25, when operating in RTO mode, the permittee shall operate the RCO/RTO system with a minimum firebox temperature of 1500 °F. After the initial performance tests required by Conditions #23 and #25, when operating in RTO mode, the permittee shall operate the RCO/RTO system in accordance with the minimum temperatures established as specified in 40 CFR 63.2262.
(9 VAC 5-80-110 and Condition #29 of the February 5, 2009 NSR permit)

28. The permittee shall conduct catalyst activity tests of the RCO/RTO system when operating in RCO mode at least once every 12 months in accordance with Table 7 of 40 CFR 63 Subpart DDDD. The permittee shall take any necessary corrective actions to ensure that the catalyst is performing within its design range.
(9 VAC 5-80-110 and Condition #27 of the February 5, 2009 NSR permit)
29. The RCO/RTO system exhaust (Stack ID #54) shall be observed visually at least once each operating week for at least a brief time period to determine if the RTO exhausts have normal visible emissions (does not include condensed water vapor/steam), unless a 40 CFR 60 Appendix A Method 9 visible emissions evaluation is performed on the emissions unit. Each emissions unit observed having above-normal visible emissions shall be followed up with a 40 CFR 60 Appendix A Method 9 visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible and recorded, and the cause and corrective measures taken are recorded.
(9 VAC 5-80-110)
30. The permittee shall implement an approved Compliance Assurance Monitoring (CAM) Plan to monitor the RCO/RTO system controlling VOC from the board press (Ref. #5000). For the purposes of this permit, VOC from the board press is referred to as "PSEU D"; with the acronym PSEU standing for Pollutant Specific Emissions Unit. The approved monitoring plan shall be the attached CAM Plan (Attachment B) or the most recent revision to that plan that has been: (1) developed and approved pursuant to 40 CFR 64.7(e) and Section VI; (2) revised pursuant to a Quality Improvement Plan in accordance with 40 CFR 64.8 and Section VI of this permit; or (3) otherwise approved by the DEQ conforming with Section VI of this permit, including, but not limited to, changes initiated by DEQ. See Section VI of this permit for additional CAM requirements for PSEU D including the Quality Improvement Plan threshold.
(9 VAC 5-80-110 and 40 CFR 64.6(c))
31. The permittee shall furnish written notification to the Director, Piedmont Regional Office of:
 - a. The actual start-up date of the RCO/RTO system in RTO mode within 10 days after such date.
 - b. The anticipated date of the performance tests referenced in Conditions #22-25 for the RTO mode postmarked at least 30 days prior to such date.
(9 VAC 5-80-110 and Condition #40 of the February 5, 2009 NSR permit)
32. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, Piedmont Regional Office. These records shall include, but are not limited to:
 - a. The yearly throughput of wood flakes (in dry tons) to the board press (Ref. #5000), calculated as the sum of each consecutive 12-month period (i.e. the 12-month rolling total).
 - b. Records of the emission factors used to calculate the emissions of each pollutant with an emission limitation in Condition #20.
 - c. The data recorded by the continuous monitors required by Condition #26 and calibration and maintenance records for each such monitor.
 - d. Records and results of the performance tests required by Condition #25 for the RCO mode and for the RTO mode (if the system ever operates in RTO mode).

- e. Annual catalyst activity records/results and subsequent corrective actions for the RCO/RTO system (RCO mode only).
- f. The results of the weekly visible emission inspections of the RTO exhausts required by Condition #29 and details of any corrective action taken as a result of these inspections.

These records shall be maintained on-site and made available for inspection by the DEQ and shall be current for the most recent five years.

(9 VAC 5-80-110 and Condition #41 of the February 5, 2009 NSR permit)

Reporting

- 33. The permittee shall report the results of any 40 CFR Part 60 Method 9 opacity test performed as a result of Condition #29 above. If the test indicates the facility is out of compliance with the standard contained in Condition #21 of this section, the source shall also report the length of time associated with any exceedance of the standard and the corrective actions taken to correct the exceedance. This report shall be sent to the Director, Piedmont Regional Office.
(9 VAC 5-80-110)

Plywood and Composite Wood Products (PCWP) MACT

- 34. See Section IV of this permit for PCWP MACT requirements for the board press (Ref. #5000).
(9 VAC 5-80-110 and 40 CFR 63 Subpart DDDD)

C. Edge Seal Spray Booth (Ref. #6200)

Limitations

35. Particulate Matter and PM-10 emissions from the edge seal spray booth (Ref. #6200) shall be controlled by a water wash filter. The water wash filter shall be provided with adequate access for inspection.
(9 VAC 5-80-110 and Condition #10 of the February 5, 2009 NSR permit)
36. Volatile Organic Compound emissions from the edge seal spray booth (Ref. #6200) shall be controlled by the use of water-based paint having a volatile organic compound content of no more than 0.08 pounds per gallon.
(9 VAC 5-80-110 and Condition #11 of the February 5, 2009 NSR permit)
37. The annual throughput of spray paint to the edge seal spray booth (Ref. #6200) shall not exceed 85,000 gallons, calculated as the sum of each consecutive 12-month period (i.e. the 12-month rolling total).
(9 VAC 5-80-110 and Condition #22 of the February 5, 2009 NSR permit)
38. Emissions from the operation of the edge seal spray booth (Ref. #6200) shall not exceed the limits specified below:

Pollutants	lbs/hr	tons/yr
Particulate Matter	0.5	0.5
PM-10	0.5	0.5
Volatile Organic Compounds	0.8	3.4

(9 VAC 5-80-110 and Condition #34 of the February 5, 2009 NSR permit)

Monitoring/Recordkeeping

39. The permittee shall conduct weekly inspections of the water wash filter installed on the edge seal spray booth (Ref. #6200). If during any such inspection, the water wash filter is found to be inoperable or in a malfunctioning state, the filter shall be repaired and returned to operation as expeditiously as possible.
(9 VAC 5-80-110)
40. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, Piedmont Regional Office. These records shall include, but are not limited to:
- a. The yearly throughput of spray paint (in gallons) to the edge seal spray booth (Ref. #6200), calculated as the sum of each consecutive 12-month period (i.e. the 12-month rolling total).
 - b. The results of the weekly inspections of the water wash filter required by Condition #39 and details of any corrective action taken as a result of these inspections.
 - c. The Material Safety Data Sheet of each coating applied in the edge seal spray booth, including the VOC content of such coatings.

- d. Records of the emission factors used to calculate the emissions of each pollutant with an emission limitation in Condition #38.

These records shall be maintained on-site and made available for inspection by the DEQ and shall be current for the most recent five years.

(9 VAC 5-80-110 and Condition #41 of the February 5, 2009 NSR permit)

Plywood and Composite Wood Products (PCWP) MACT

- 41. See Section IV of this permit for PCWP MACT requirements for the edge seal spray booth (Ref. #6200).
(9 VAC 5-80-110 and 40 CFR 63 Subpart DDDD)

D. Woodwaste Material Handling, Collection, Storage, and Transfer systems (Ref. #1000/1350, 3100, 3200, 3300, 3400, 3500, 3600, 5100, 5200, 6100, 9100, and 9200)

Limitations

42. Particulate Matter and PM-10 emissions from the green chip handling system (Ref. #1000/1350, Stack ID #11) shall be controlled by a cyclone. The cyclone shall be provided with adequate access for inspection. An annual internal inspection shall be conducted on the cyclone by the permittee to insure structural integrity.
(9 VAC 5-80-110 and Condition #2 of the February 5, 2009 NSR permit)

43. Particulate Matter and PM-10 emissions from the following equipment shall be controlled by fabric filters:

<u>Ref. #</u>	<u>Stack ID</u>	<u>Process/System Description</u>
6100	12	Panel Sanding/Tongue & Groove
5100	13	Forming & Finishing End Pickups
9100	14a	General Plant Dedusting - System A
9200	14b	General Plant Dedusting - System B
3100	15	Screen Fines Transfer
3200	16	Dry Waste Transfer
5200	17	Mat Reject
3300	18	Sanderdust/Hog Fuel Transfer/Storage
3400	19	Grit Fines Transfer
3500	20	Fuel Screen Fines Storage Bin/MEC Raw Fuel Transfer
3600	21	Dry Fuel Hammermill/MEC Prepared Fuel Transfer

Each fabric filter shall be provided with adequate access for inspection. Each fabric filter shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter. For the purposes of this condition, "continuously" means that the monitoring system is capable of completing at least one cycle of operation (sampling) every 15 minutes. The device shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times, except during system breakdowns/repairs, calibration checks, and zero and span adjustments.

(9 VAC 5-80-110 and Condition #3 of the February 5, 2009 NSR permit)

44. The dry waste transfer system (Ref. #3200), sanderdust/hog fuel storage/transfer system (Ref. #3300), fuel screen fines storage bin/MEC raw dry fuel transfer system (Ref. #3500), dry fuel hammermill/MEC prepared fuel transfer system (Ref. #3600) and blending system (Ref. #4000) shall each process no more than 400 million square feet (on a 3/8" basis) per year, calculated as the sum of each consecutive 12-month period (i.e. the 12-month rolling total).
(9 VAC 5-80-110 and Condition #20 of the February 5, 2009 NSR permit)
45. The panel sanding/tongue and groove system (Ref. #6100) shall process no more than 284 million square feet (on a 3/8" basis) per year, calculated as the sum of each consecutive 12-month period (i.e. the 12-month rolling total).
(9 VAC 5-80-110 and Condition #21 of the February 5, 2009 NSR permit)

46. Emissions from the operation of the material handling systems shall not exceed the limits specified below:

<u>System/Pollutants</u>	<u>gr/dscf</u>	<u>lbs/hr</u>	<u>tons/yr</u>
<u>Green Chip Handling</u>			
Particulate Matter	0.03	0.8	3.3
PM-10	0.03	0.8	3.3
<u>Panel Sanding/Tongue & Groove</u>			
Particulate Matter	0.01	3.8	16.0
PM-10	0.01	3.8	16.0
<u>Forming & Finishing End Pickups</u>			
Particulate Matter	0.01	2.4	10.2
PM-10	0.01	2.4	10.2
<u>General Plant Dedusting - System A</u>			
Particulate Matter	0.01	3.1	13.1
PM-10	0.01	3.1	13.1
<u>General Plant Dedusting - System B</u>			
Particulate Matter	0.01	2.6	11.1
PM-10	0.01	2.6	11.1
<u>Screen Fines Transfer</u>			
Particulate Matter	0.01	0.5	0.9
PM-10	0.01	0.5	0.9
<u>Dry Waste Transfer</u>			
Particulate Matter	0.01	0.5	1.9
PM-10	0.01	0.5	1.9
<u>Mat Reject</u>			
Particulate Matter	0.01	3.6	15.2
PM-10	0.01	3.6	15.2
<u>Sanderdust/Hog Fuel Transfer/Storage</u>			
Particulate Matter	0.01	0.5	1.7
PM-10	0.01	0.5	1.7
<u>Grit Fines Transfer</u>			
Particulate Matter	0.01	0.5	0.5
PM-10	0.01	0.5	0.5
<u>Fuel Screen Fines Storage Bin</u>			
Particulate Matter	0.01	0.5	1.0
PM-10	0.01	0.5	1.0
<u>Dry Fuel Hammermill</u>			
Particulate Matter	0.01	1.0	4.4
PM-10	0.01	1.0	4.4

(9 VAC 5-80-110 and Condition #30 of the February 5, 2009 NSR permit)

47. Volatile Organic Compound emissions from the operation of the following equipment shall not exceed the limits specified below:

System/Process (Ref. #)	lbs/hr	tons/yr
Dry Waste Transfer (3200)	4.9	17.2
Sanderdust/Hog Fuel Storage/Transfer (3300)	3.4	12.0
Fuel Screen Fines Storage Bin/MEC Raw Fuel Transfer (3500)	3.4	12.0
Dry Fuel Hammermill/MEC Prepared Fuel Transfer (3600)	3.4	12.0
Blending (4000)	9.1	32.0
Panel Sanding/Tongue and Groove (6100)	5.8	25.6

(9 VAC 5-80-110 and Condition #33 of the February 5, 2009 NSR permit)

48. Visible emissions from the material handling system exhausts shall not exceed 5 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown and malfunction.
 (9 VAC 5-80-110 and Condition #36 of the February 5, 2009 NSR permit)

Monitoring/Recordkeeping

49. Each emissions unit listed in Condition #46 that is not covered under the CAM requirements of Condition #51 shall be observed visually at least once each operating week for at least a brief time period to determine which emissions units have any visible emissions (does not include condensed water vapor/steam), unless a 40 CFR 60 Appendix A Method 9 visible emissions evaluation is performed on the emissions unit. Each emissions unit observed having any visible emissions shall be followed up with a 40 CFR 60 Appendix A Method 9 visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible and recorded, and the cause and corrective measures taken are recorded.
 (9 VAC 5-80-110)
50. The permittee shall conduct monthly inspections of the differential pressure devices installed on the fabric filters listed in Condition #43. Any differential pressure device found to be inoperable or in a malfunctioning state shall be repaired and returned to operation as expeditiously as possible.
 (9 VAC 5-80-110)
51. The permittee shall implement an approved Compliance Assurance Monitoring (CAM) Plan to monitor the fabric filter systems controlling PM/PM-10 from the equipment listed in Condition #43. For the purposes of this permit,

PM/PM-10 from the panel handling/tongue & groove system (#6100) is referred to as "PSEU E",
 PM/PM-10 from the forming & finishing end pickup system (#5100) is referred to as "PSEU F",
 PM/PM-10 from the general plant dedusting – system A (#9100) is referred to as "PSEU G",
 PM/PM-10 from the general plant dedusting – system B (#9200) is referred to as "PSEU H",
 PM/PM-10 from the screen fines transfer system (#3100) is referred to as "PSEU I",
 PM/PM-10 from the dry waste transfer system (#3200) is referred to as "PSEU J",
 PM/PM-10 from the mat reject system (#5200) is referred to as "PSEU K",
 PM/PM-10 from the sanderdust/hog fuel transfer/storage system (#3300) is referred to as "PSEU L",
 PM/PM-10 from the grit fines transfer system (#3400) is referred to as "PSEU M",

PM/PM-10 from the fuel screen fines storage bin/MEC raw fuel transfer system (#3500) is referred to as "PSEU N",
PM/PM-10 from the dry fuel hammermill/MEC prepared fuel transfer system (#3600) is referred to as "PSEU O";

with the acronym PSEU standing for Pollutant Specific Emissions Unit. The approved monitoring plan shall be the attached CAM Plan (Attachment C) or the most recent revision to that plan that has been: (1) developed and approved pursuant to 40 CFR 64.7(e) and Section VI; (2) revised pursuant to a Quality Improvement Plan in accordance with 40 CFR 64.8 and Section VI of this permit; or (3) otherwise approved by the DEQ conforming with Section VI of this permit, including, but not limited to, changes initiated by DEQ. See Section VI of this permit for additional CAM requirements for PSEU E-O including their Quality Improvement Plan thresholds.
(9 VAC 5-80-110 and 40 CFR 64.6(c))

52. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, Piedmont Regional Office. These records shall include, but are not limited to:
- a. The results of the annual structural integrity inspection of the green chip handling system required by Condition #42 and details of any corrective action taken as a result of these inspections
 - b. The results of the monthly inspections of the differential pressure devices required by Condition #50 and details of any corrective action taken as a result of these inspections
 - c. The results of the weekly visible emission observations required by Condition #49 and details of any corrective action taken as a result of these inspections
 - d. Records of the emission factors used to calculate the emissions of each pollutant with an emission limitation in Conditions #46 or #47.
 - e. The yearly throughput of wood (in millions of square feet @3/8") to each system specified in Conditions #44 and #45, calculated as the sum of each consecutive 12-month period (i.e. the 12-month rolling total).

These records shall be maintained on-site and made available for inspection by the DEQ and shall be current for the most recent five years.
(9 VAC 5-80-110 and Condition #41 of the February 5, 2009 NSR permit)

Reporting

53. The permittee shall report the results of any 40 CFR Part 60 Method 9 opacity test performed as a result of Condition #49. If the test indicates the facility is out of compliance with the standard contained in Condition #48, the source shall also report the length of time associated with any exceedance of the standard and the corrective actions taken to correct the exceedance. This report shall be sent to the Director, Piedmont Regional Office.
(9 VAC 5-80-110 E)

E. Emergency Generators (Ref. #D027 and D029)

Stationary Reciprocating Internal Combustion Engines (RICE) MACT

54. See Section V of this permit for RICE MACT requirements for the emergency generators.
(9 VAC 5-80-110 and 40 CFR 63 Subpart ZZZZ)

IV. 40 CFR 63 Subpart DDDD – National Emissions Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products

A. Subpart DDDD Emission Limits and Work Practice Requirements

55. The permittee shall use an emission control system and demonstrate that the resulting emissions meet the compliance options and operating requirements of Tables 1B and 2 of 40 CFR 63 Subpart DDDD:

- a. For the Wellons/flake dryer system (Ref. #3000) and the board press (Ref. #5000), the requirements of Table 1B are as follows:
 - (i) reduce emissions of total HAP, measured as THC (as carbon, from which methane may be subtracted), by 90 percent; or
 - (ii) limit emissions of total HAP, measured as THC (as carbon, from which methane may be subtracted), to 20 ppmvd; or
 - (iii) reduce methanol emissions by 90 percent; or
 - (iv) limit methanol emissions to less than or equal to 1 ppmvd if uncontrolled methanol emissions entering the control device are greater than or equal to 10 ppmvd; or
 - (v) reduce formaldehyde emissions by 90 percent; or
 - (vi) limit formaldehyde emissions to less than or equal to 1 ppmvd if uncontrolled formaldehyde emissions entering the control device are greater than or equal to 10 ppmvd.
- b. To meet the Table 2 requirements for the Wellons/flake dryer system, the permittee shall maintain the 3-hour block average firebox temperature of RTO 1-2 above the minimum temperature established during the performance test.
- c. For the board press, the requirements of Table 2 are as follows:
 - (i) When RCO/RTO-1 is operating in RCO mode, the permittee shall maintain the 3-hour block average RCO combustion chamber temperature above the minimum temperature established during the performance test; and check the activity level of a representative sample of the catalyst at least every 12 months.
 - (ii) When RCO/RTO-1 is operating in RTO mode, the permittee shall maintain the 3-hour block average firebox temperature above the minimum temperature established during the performance test.
 - (iii) The permittee shall have a capture device that either meets the definition of wood products enclosure in 40 CFR 63.2292 or achieves a capture efficiency of greater than or equal to 95 percent.

(40 CFR 63.2240(b), 63.2267 and 9 VAC 5-80-110)

56. For each group 1 miscellaneous coating operation, the permittee shall use non-HAP coatings as defined in 40 CFR 63.2292.
(40 CFR 63.2241, Table 3 of 40 CFR 63 Subpart DDDD and 9 VAC 5-80-110)

B. Subpart DDDD Operating Plans/Requirements

57. The permittee must be in compliance with the compliance options, operating requirements, and the work practice requirements in 40 CFR 63 Subpart DDDD at all times, except during periods of process unit or control device startup, shutdown, and malfunction; and prior to process unit initial startup; and during the routine control device maintenance exemption specified in 40 CFR

63.2251. The compliance options, operating requirements, and work practice requirements do not apply during times when the process unit(s) subject to the compliance options, operating requirements, and work practice requirements are not operating, or during scheduled periods of startup, and shutdown periods, and during malfunctions. Startup and shutdown periods must not exceed the minimum amount of time necessary for these events.

(40 CFR 63.2250(a) and VAC 5-80-110)

58. The permittee shall always operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions of 40 CFR 63.6(e)(1)(i).
(40 CFR 63.2250(b) and VAC 5-80-110)
59. The permittee shall develop a written startup, shutdown, and malfunction plan (SSMP) according to the provisions of 40 CFR 63.6(e)(3).
(40 CFR 63.2250(c) and 9 VAC 5-80-110)
60. The permittee shall demonstrate initial compliance with each compliance option, operating requirement, and work practice requirement that applies to the permitted facility according to Tables 5 and 6 of 40 CFR 63 Subpart DDDD and according to 40 CFR 63.2260 through 40 CFR 63.2269.
(40 CFR 63.2260(b) and 9 VAC 5-80-110)

C. Subpart DDDD Monitoring/Testing Requirements

61. The permittee shall install, operate, and maintain each continuous parameter monitoring system (CPMS) according to paragraphs (a)(1) through (3) of 40 CFR 63.2269 and this condition.
 - a. The CPMS shall be capable of completing a minimum of one cycle of operation (sampling, analyzing, and recording) for each successive 15-minute period.
 - b. At all times, you shall maintain the monitoring equipment including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
 - c. Record the results of each inspection, calibration, and validation check.

(40 CFR 63.2269(a) and 9 VAC 5-80-110)
62. For each temperature monitoring device, the permittee shall meet the requirements in Condition #61, paragraphs (b)(1) through (6) of 40 CFR 63.2269 and this condition.
 - a. Locate the temperature sensor in a position that provides a representative temperature.
 - b. Use a temperature sensor with a minimum accuracy of 4 °F or 0.75 percent of the temperature value, whichever is larger.
 - c. If a chart recorder is used, it shall have a sensitivity with minor divisions not more than 20 °F.
 - d. Perform an electronic calibration at least semiannually according to the procedures in the manufacturer's owner's manual. Following the electronic calibration, the permittee shall conduct a temperature sensor validation check in which a second or redundant temperature sensor placed nearby the process temperature sensor must yield a reading within 30 °F of the process temperature sensor's reading.

- e. Conduct calibration and validation checks any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor.
- f. At least quarterly, inspect all components for integrity and all electrical connections for continuity, oxidation, and galvanic corrosion.

(40 CFR 63.2269(b) and 9 VAC 5-80-110)

63. The permittee shall monitor and collect data according to 40 CFR 63.2270 and this condition:

- a. Except for, as appropriate, monitor malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation at all times that the process unit is operating. For purposes of calculating data averages, the permittee shall not use data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities. The permittee shall use all the data collected during all other periods in assessing compliance. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. Any period for which the monitoring system is out-of-control and data are not available for required calculations constitutes a deviation from the monitoring requirements.
- b. The permittee shall not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities; data recorded during periods of startup, shutdown, and malfunction; or data recorded during periods of control device downtime covered in any approved routine control device maintenance exemption in data averages and calculations used to report emission or operating levels, nor shall such data be used in fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control system.
- c. Determine the 3-hour block average of all recorded readings, calculated after every 3 hours of operation as the average of the evenly spaced recorded readings in the previous 3 operating hours (excluding periods described in paragraphs (a) and (b) of this condition).
- d. To calculate the data averages for each 3-hour averaging period, the permittee shall have at least 75 percent of the required recorded readings for that period using only recorded readings that are based on valid data (*i.e.*, not from periods described in paragraphs (a) and (b) of this condition).

(40 CFR 63.2270 and 9 VAC 5-80-110)

64. The permittee shall conduct performance tests and establish each site-specific operating requirement in Table 2 of 40 CFR 63 Subpart DDDD according to the requirements in 40 CFR 63.2262 and Table 4 of 40 CFR 63 Subpart DDDD.
(40 CFR 63.2260(a) and 9 VAC 5-80-110)

65. The permittee shall conduct each performance test according to the requirements in 40 CFR 63.7(e)(1), the requirements in paragraph (b) through (o) of 40 CFR 63.2262, and according to the methods specified in Table 4 of 40 CFR 63 Subpart DDDD.
(40 CFR 63.2262 and 9 VAC 5-80-110)

D. Subpart DDDD Reporting Requirements

66. The permittee shall submit all of the notifications in 40 CFR 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9(b) through (e), and (g) and (h) by the dates specified. These notifications shall include, but are not limited to:

- a. Notification of Performance Test – If the permittee is required to conduct a performance test, the permittee shall submit a written notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin as specified in 40 CFR 63.7(b)(1).
- b. Notification of Compliance Status (NOCS) – If the permittee is required to conduct a performance test, design evaluation, or other initial compliance demonstration as specified in Tables 4, 5, and 6 of 40 CFR 63 Subpart DDDD, the permittee shall submit a Notification of Compliance Status as specified in 40 CFR 63.9(h)(2)(ii).
- c. The permittee shall notify the Director, Piedmont Regional Office and the EPA Administrator within 30 days before:
 - (i) The permittee modifies or replaces the control system for any process unit subject to the compliance options and operating requirements of 40 CFR 63 Subpart DDDD; or
 - (ii) The permittee changes a continuous monitoring parameter or the value or range of values of a continuous monitoring parameter for any process unit or control device.

(40 CFR 63.2280 and VAC 5-80-110)

67. The permittee shall submit each report in Table 9 of 40 CFR 63 Subpart DDDD that applies to the permitted facility. Unless the Administrator has approved a different schedule for submission of reports under 40 CFR 63.10(a), the permittee shall submit each report by the date in Table 9 of 40 CFR 63 Subpart DDDD and as specified in paragraphs (b)(1) through (5) of 40 CFR 63.2281. The permittee shall report each instance in which the permitted facility did not meet each compliance option, operating requirement, and work practice requirement in Tables 7 and 8 of 40 CFR 63 Subpart DDDD that applies to the permitted facility. These instances are deviations from the work practice requirements in 40 CFR 63 Subpart DDDD. These deviations shall be reported according in the compliance reports referenced below.

- a. Compliance Reports – Each compliance report shall contain the information in 40 CFR 63.2281(c) through (g), as applicable.
- b. Immediate Start-up, Shutdown and Malfunction Reports – These reports shall be submitted if a SSM event occurs during the reporting period and the actions taken during the event are not consistent with the SSM plan. The permittee shall submit the actions taken for the event by fax or telephone within 2 working days after starting actions inconsistent with the plan. The permittee shall submit the information specified in 40 CFR 63.10(d)(5)(ii) by letter within 7 working days after the end of the event unless alternative arrangements are approved.

(40 CFR 63.2271, 40 CFR 63.2281 and VAC 5-80-110)

E. Subpart DDDD Recordkeeping Requirements

68. As specified in 40 CFR 63.10(b)(1), the permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The

permittee shall keep records on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to 40 CFR 63.10(b)(1). The permittee can keep the records offsite for the remaining 3 years. The permittee's records shall be in a form suitable and readily available for expeditious review as specified in 40 CFR 63.10(b)(1). These records shall include, but are not limited to:

- a. A copy of each notification and report that the permittee submitted to comply with 40 CFR 63 Subpart DDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv);
- b. The records in 40 CFR 63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction;
- c. Records of performance test and performance evaluations as required in 40 CFR 63.10(b)(2)(viii);
- d. Documentation of any approved routine control device maintenance exemption;
- e. Records as required in 40 CFR 63 Subpart DDDD, Tables 7-8 to show continuous compliance with each compliance option, operating requirement, and work practice requirement that applies; and
- f. Records of annual catalyst activity checks and subsequent corrective actions.

(40 CFR 63.2282, 40 CFR 63.2283 and VAC 5-80-110)

F. Subpart DDDD General Compliance Requirement

69. Except where this permit is more restrictive than the applicable requirement, the permittee shall operate in compliance with all applicable requirements of 40 CFR 63 Subparts A and DDDD. Table 10 of 40 CFR 63 Subpart DDDD shows which parts of the General Provisions in 40 CFR 63.1 through 63.13 apply to the permittee.
(40 CFR 63, Subparts A and DDDD and 9 VAC 5-80-110)

V. 40 CFR 63 Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

A. Subpart ZZZZ Work Practice Requirements

70. As stated in 40 CFR 63.6602 and 63.6640, and as excepted in Table 2C of 40 CFR 63 Subpart ZZZZ, the permittee shall comply with the following requirements for emergency generators Ref. #D027 and D029:

- a. Change oil and filter every 500 hours of operation or annually, whichever comes first.
- b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first.
- c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

(40 CFR 63.6602, Table 2C of 40 CFR 63 Subpart ZZZZ and 9 VAC 5-80-110)

71. The permittee shall operate and maintain each emergency generator (Ref. #D027 and D029) and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a site-specific maintenance plan which shall provide to the extent practicable for the maintenance and operation of the each emergency generator in a manner consistent with good air pollution control practice for minimizing emissions.
(40 CFR 63.6625(e) and 9 VAC 5-80-110)

72. For emergency generators Ref. #D027 and D029, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as permitted in this condition, shall be prohibited:

- a. There shall be no time limit on the use of emergency generators in emergency situations.
- b. The permittee may operate emergency generators for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the unit. Maintenance checks and readiness testing of such units shall be limited to 100 hours per year. The permittee may petition the Director, Piedmont Regional Office for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency generators beyond 100 hours per year.
- c. The permittee may operate each emergency generator up to 50 hours per year in non-emergency situations, but those 50 hours shall be counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations shall not be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that the permittee may operate each emergency generator for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. Each emergency generator shall not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and each emergency generator's operation shall be terminated

immediately after the permittee is notified that the emergency condition is no longer imminent. The 15 hours per year of demand response operation shall be counted as part of the 50 hours of operation per year provided for non-emergency situations. The supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by this condition, as long as the power provided by the financial arrangement is limited to emergency power.

(40 CFR 63.6640(f) and 9 VAC 5-80-110)

B. Subpart ZZZZ Monitoring Requirements

73. The permittee shall install a non-resettable hour meter on each emergency generator (Ref. #D027 and D029) if one is not already installed.
(40 CFR 63.6625(f) and 9 VAC 5-80-110)

C. Subpart ZZZZ Reporting Requirements

74. The permittee shall submit a semi-annual compliance report as specified in Table 7 of 40 CFR 63 Subpart ZZZZ. The permittee shall submit each report by the date specified in 40 CFR 63.6650(b). Each compliance report shall contain the information specified by 40 CFR 63.6650 and the information specified below:
- a. If there are no deviations from any emission limitations or operating limitations that apply to you, a statement that there were no deviations from the emission limitations or operating limitations during the reporting period.
 - b. If there are one or more deviations from any emission limitation or operating limitation during the reporting period, the information in 40 CFR 63.6650(d).
 - c. If there are one or more malfunctions during the reporting period, the information in 40 CFR 63.6650(c)(4).

(40 CFR 63.6650 and VAC 5-80-110)

D. Subpart ZZZZ Recordkeeping Requirements

75. As specified in 40 CFR 63.10(b)(1), the permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee shall keep records on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to 40 CFR 63.10(b)(1). The permittee can keep the records offsite for the remaining 3 years. The permittee's records shall be in a form suitable and readily available for expeditious review as specified in 40 CFR 63.10(b)(1). These records shall include, but are not limited to:
- a. Records of the maintenance conducted on each emergency generator (Ref. #D027 and D029) in order to demonstrate that the permittee operated and maintained the units and after-treatment control devices (if any) according to the maintenance plan required by Condition #71.
 - b. Records of the hours of operation of each emergency generator that is recorded through the non-resettable hour meter. The permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the emergency generators are used for demand response operation, the permittee shall keep records of the notification of the emergency situation, and the time each emergency generator was operated as part

of demand response.

(40 CFR 63.6655(e-f) and VAC 5-80-110)

E. Subpart ZZZZ General Compliance Requirement

76. The permittee shall operate in compliance with all applicable requirements of 40 CFR 63 Subparts A and ZZZZ. Table 8 of 40 CFR 63 Subpart ZZZZ shows which parts of the General Provisions in 40 CFR 63.1 through 63.13 apply to the permittee. As specified by 40 CFR 63 Subpart ZZZZ, the requirements of Conditions #70 through #76 shall not be applicable to the emergency generators (Ref. #D027 and D029) until May 3, 2013.
(40 CFR 63, Subparts A and ZZZZ and 9 VAC 5-80-110)

VI. Compliance Assurance Monitoring (CAM) Requirements

77. Each monitoring approach shall be designed and implemented in compliance with 40 CFR 64.3(b) or (d). If a monitoring approach uses a monitoring device, the device shall be operated according to manufacturer's specifications, unless other methods are approved, and in compliance with 40 CFR 64.3(b) or (d). The approved CAM Plan shall include, at a minimum, the following information:
- a. Indicator;
 - b. Measurement Approach;
 - c. Indicator Range or Condition(s) for Range Development; and
 - d. The following performance criteria:
 - (i) Data Representativeness;
 - (ii) Verification of Operational Status;
 - (iii) QA/QC Practices and Criteria;
 - (iv) Monitoring Frequency;
 - (v) Data Collection Procedures; and
 - (vi) Averaging Period

Changes to a CAM Plan pertaining to the information in this condition require prior approval by the DEQ and may require public participation according to the requirements of 9 VAC 5-80-230. (9 VAC 5-80-110 E and 40 CFR 64.6(c))

78. The permittee shall conduct the monitoring and fulfill the other obligations specified in 40 CFR 64.7 through 40 CFR 64.9. (9 VAC 5-80-110 E and 40 CFR 64.6(c))
79. If a monitoring approach uses a monitoring device, at all times, the permittee shall maintain the monitoring equipment, including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment. (9 VAC 5-80-110 E and 40 CFR 64.7(b))
80. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the PSEU is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of compliance assurance monitoring, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by inadequate maintenance or improper operation are not malfunctions. (9 VAC 5-80-110 E and 40 CFR 64.7(c))
81. Upon detecting an excursion or exceedance, the permittee shall restore operation of the PSEU (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and

prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup and shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator, designated condition, or below the applicable emission limitation or standard, as applicable.

(9 VAC 5-80-110 E and 40 CFR 64.7(d)(1))

82. Determination that acceptable procedures were used in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.
 (9 VAC 5-80-110 E and 40 CFR 64.7(d)(2))
83. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly (in accordance with Condition #IX.E) notify the Piedmont Regional Office and submit a revised CAM Plan for approval to the Piedmont Regional Office to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
 (9 VAC 5-80-110 E, 40 CFR 64.7(e), and 40 CFR 64.6(c))
84. For each PSEU, the Quality Improvement Plan (QIP) threshold shall be as shown in the following table:

PSEU			QIP Triggering Threshold
ID	Condition No.	Pollutant	
PSEU A	13	PM/PM-10	5% for the operating time for Wellons/flake dryer system
PSEU B	13	CO	5% for the operating time for Wellons/flake dryer system
PSEU C	13	VOC	5% for the operating time for Wellons/flake dryer system
PSEU D	30	VOC	5% for the operating time for the board press
PSEU E-O	51	PM/PM-10	2 excursions in a 2 week period per system

For any PSEU, if the number of exceedances or excursions exceeds its threshold in the above table, or as otherwise required by the DEQ in accordance with review conducted under 40 CFR 64.7(d)(2), the permittee shall develop, implement and maintain a QIP in accordance with 40 CFR 64.8. If a QIP is required, the permittee shall have it available for inspection at the permitted facility. In the event that changes are made to a CAM Plan as a result of a QIP, the permittee shall record the revision date on Page 1 of the CAM Plan and monitor in accordance with the most recent CAM Plan. The permittee shall submit a copy of the most recent CAM Plan to the Piedmont Regional Office within 30 days of the revision date. For the purposes of this condition, the most recent version of a CAM Plan shall be based on the date as shown on page 1 of the CAM Plan.

(9 VAC 5-80-110 E and 40 CFR 64.8(a) and (b))

85. Monitoring imposed under 40 CFR Part 64 shall not excuse the permittee from complying with any existing requirements under federal, state, or local law, or any other applicable requirement under the Act, as described in 40 CFR 64.10.
 (9 VAC 5-80-110 and 40 CFR 64.10)

86. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written QIP required pursuant to 40 CFR 64.8 and any activities undertaken to implement a QIP, and other supporting information required to be maintained under 40 CFR Part 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).
(9 VAC 5-80-110 F and 40 CFR 64.9(b))
87. The permittee shall submit CAM reports for each PSEU as part of the Title V semi-annual monitoring reports required by Condition #IX.C.3 of this permit to the Piedmont Regional Office. Each report shall include at a minimum:
- a. Identification of the PSEU for which the report is made;
 - b. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
 - c. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
 - d. A description of the actions taken to implement a QIP during the reporting period as specified in 40 CFR 64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

(9 VAC 5-80-110 F and 40 CFR 64.9(a))

VII. Facility Wide Conditions and Permit Terms

Limitations

88. Unless otherwise specified, the facility roads and those portions of the log yard subject to vehicular traffic shall incorporate dust emission controls to include the following or equivalent as a minimum:

- a. For portions of the log yard subject to regular vehicular traffic, reasonable precautions shall be taken to prevent deposition of dirt on public roads and subsequent dust emissions. The facility roads and those portions of the log yard subject to regular vehicular traffic shall be paved.
- b. For areas of the facility subject to more sporadic vehicular traffic (such as the log storage area), dust emissions shall be controlled by the use of course gravel and wet suppression or equivalent (as approved by the DEQ).

(9 VAC 5-80-110 and Condition #12 of the February 5, 2009 NSR permit)

89. Fugitive particulate emissions from the transfer, collection, and storage of wood flakes, chips, dust, fines, and waste materials shall be controlled to ensure compliance with Condition #91. (9 VAC 5-80-110 and Condition #13 of the February 5, 2009 NSR permit)

90. Regardless of the emission limits specified in Conditions #8, #20, #38, #46 and #47, the total emissions from the operation of the equipment listed in Section II of this permit (except for Ref. #D027 and D029) shall not exceed the limits specified below:

Pollutants	lbs/hr	tons/yr
Particulate Matter	47.4	168.7
PM-10	47.4	168.7
Sulfur Dioxide	6.7	24.1
Nitrogen Oxides	58.8	193.5
Carbon Monoxide	44.0	148.8
Volatile Organic Compounds	53.4	189.0

(9 VAC 5-80-110 and Condition #35 of the February 5, 2009 NSR permit)

91. Visible emissions from fugitive emission points shall not exceed 10 percent opacity. (9 VAC 5-80-110 and Condition #39 of the February 5, 2009 NSR permit)

92. This standard is applicable to the following emission units: the edge seal spray booth (Ref. #6200) and the emergency generators (Ref. #D027 and D029). Unless specified otherwise in this part, on or after the date on which the performance test required to be conducted by 9 VAC 5-50-30 is completed, no owner or other person shall cause or permit to be discharged into the atmosphere from any affected facility any visible emissions which exhibit greater than 20% opacity, except for one six minute period in any one hour of not more than 30% opacity. Failure to meet the requirements of this section because of the presence of water vapor shall not be a violation of this section.

(9 VAC 5-50-80)

93. The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment, monitoring devices, and process equipment which affect such emissions:
- a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
 - b. Maintain an inventory of spare parts.
 - c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
 - d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

Records of maintenance and training shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request.
(9 VAC 5-80-110 and Condition #49 of the February 5, 2009 NSR permit)

Monitoring/Recordkeeping/Reporting

94. Each fugitive emissions source shall be observed visually at least once each operating week for at least a brief time period to determine which fugitive emissions points have normal visible emissions (does not include condensed water vapor/steam), unless a 40 CFR 60 Appendix A Method 9 visible emissions evaluation is performed on the emissions point. Each emissions point observed having above-normal visible emissions shall be followed up with a 40 CFR 60 Appendix A Method 9 visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible and recorded, and the cause and corrective measures taken are recorded.
(9 VAC 5-80-110)
95. Each emissions unit with a visible emissions requirement in Condition #92 shall be observed visually at least once each operating week for at least a brief time period to determine which operating emissions units have normal visible emissions (does not include condensed water vapor/steam), unless a 40 CFR 60 Appendix A Method 9 visible emissions evaluation is performed on the emissions unit. Each emissions unit observed having above-normal visible emissions shall be followed up with a 40 CFR 60 Appendix A Method 9 visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible and recorded, and the cause and corrective measures taken are recorded.
(9 VAC 5-80-110 E)
96. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, Piedmont Regional Office. These records shall include, but are not limited to:
- a. The results of the weekly visible emission observations required by Conditions #94-95 and details of any corrective action taken as a result of these inspections
 - b. Records of operating procedures, training and maintenance as required by Condition #93.

These records shall be maintained on-site and made available for inspection by the DEQ and shall be current for the most recent five years.
(9 VAC 5-80-110)

97. The permittee shall report the results of any 40 CFR Part 60 Method 9 opacity test performed as a result of Conditions #94 or #95. If the test indicates the facility is out of compliance with the standards contained in Conditions #91 or #92, respectively, the source shall also report the length of time associated with any exceedance of the standard and the corrective actions taken to correct the exceedance. This report shall be sent to the Director, Piedmont Regional Office.
(9 VAC 5-20-110, 9 VAC 5-50-50 and 9 VAC 5-80-110 E)

Testing

98. The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.
(9 VAC 5-80-110)
99. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ. Unless otherwise specified by the Director, Piedmont Regional Office, the appropriate method(s) shall, to the extent possible, be consistent with the basis of the emission limit or emission standard for which compliance is to be determined.
(9 VAC 5-80-110 E)

VIII. Insignificant Emission Units

The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.	Emission Unit Description	Citation (9 VAC_)	Pollutant Emitted (5-80-720 B.)	Rated Capacity (5-80-720 C.)
1400	Fuel hog	5-80-720 B.	PM/PM-10	33.3 tons/hr.
1500	Green truck bin	5-80-720 B.	PM/PM-10	6,000 ft ³
3700	Super fines truck bin	5-80-720 B.	PM/PM-10	12,400 ft ³
3750	Screen fines truck bin	5-80-720 B.	PM/PM-10	18,800 ft ³
3800	Dry fuel silo	5-80-720 B.	PM/PM-10	9,600 ft ³
3850	Sanderdust silo	5-80-720 B.	PM/PM-10	4,600 ft ³
3900	Raw fuel storage bin (MEC dry fuel burner)	5-80-720 B.	PM/PM-10	3,600 ft ³
3950	Prepared fuel metering bin (MEC dry fuel burner)	5-80-720 B.	PM/PM-10	1,800 ft ³
T1	10,000 gallon diesel fuel storage tank	5-80-720 B.	VOC	10,000 gallons
T2	300 gallon gasoline storage tank	5-80-720 B.	VOC	300 gallons
T3	300 gallon diesel fuel storage tank	5-80-720 B.	VOC	300 gallons
T4, T5	1,000 gallon hydraulic oil storage tanks	5-80-720 B.	VOC	1,000 gallons each
T6	345 gallon used oil storage tank	5-80-720 B.	VOC	345 gallons
T7, T8, T9	275 gallon hydraulic oil storage tanks	5-80-720 B.	VOC	275 gallons each
T10, T11	275 gallon diesel fuel storage tanks	5-80-720 B.	VOC	275 gallons each
T12, T13	10,000 gallon wax storage tanks	5-80-720 B.	VOC	10,000 gallons each
T14	1,000 gallon used oil storage tank	5-80-720 B.	VOC	1,000 gallons
T15	15,000 gallon thermal oil storage tank	5-80-720 B.	VOC	15,000 gallons
T16	11,200 gallon hydraulic oil use tank	5-80-720 B.	VOC	11,200 gallons
T17	500 gallon hydraulic oil storage tank	5-80-720 B.	VOC	500 gallons
T18,	10,000 gallon resin	5-80-720 B.	VOC	10,000 gallons each

Emission Unit No.	Emission Unit Description	Citation (9 VAC_)	Pollutant Emitted (5-80-720 B.)	Rated Capacity (5-80-720 C.)
T19, T20, T21	storage tanks			

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

IX. General Permit Conditions

A. Federal Enforceability

All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.
(9 VAC 5-80-110 N)

B. Permit Expiration

This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless a timely and complete renewal application consistent with 9 VAC 5-80-80, has been submitted, to the Department, by the owner, the right of the facility to operate shall be terminated upon permit expiration.

1. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.
2. If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.
3. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.
4. If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.
5. The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.
(9 VAC 5-80-80 B, C and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)

C. Recordkeeping and Reporting

1. All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:
 - a. The date, place as defined in the permit, and time of sampling or measurements.
 - b. The date(s) analyses were performed.
 - c. The company or entity that performed the analyses.
 - d. The analytical techniques or methods used.

e. The results of such analyses.

f. The operating conditions existing at the time of sampling or measurement.

(9 VAC 5-80-110 F)

2. Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

(9 VAC 5-80-110 F)

3. The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than **March 1** and **September 1** of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

- a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.

- b. All deviations from permit requirements. For purposes of this permit, a deviation means any condition determined by observation, data from any monitoring protocol or any other monitoring which is required by the permit that can be used to determine compliance. Deviations include exceedances documented by continuous emission monitoring or excursions from control performance indicators documented through periodic or compliance assurance monitoring.

- c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semi-annual reporting period."

(9 VAC 5-80-110 F)

D. Annual Compliance Certification

Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than **March 1** each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices. The compliance certification shall comply with such additional requirements that may be specified pursuant to 114(a)(3) and 504(b) of the federal Clean Air Act. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

1. The time period included in the certification. The time period to be addressed is January 1 to December 31.

2. A description of the means for assessing or monitoring the compliance of the source with its emissions limitations, standards, and work practices.

3. The identification of each term or condition of the permit that is the basis of the certification.

4. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the certification period.

5. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.
6. The status of compliance with the terms and conditions of this permit for the certification period.
7. Such other facts as the permit may require to determine the compliance status of the source.

One copy of the annual compliance certification shall be sent to EPA at the following address:

Clean Air Act Title V Compliance Certification (3AP00)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029.

(9 VAC 5-80-110 K.5)

E. Permit Deviation Reporting

The permittee shall notify the Director, Piedmont Regional Office within four daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to Condition #IX.C.3 of this permit.
(9 VAC 5-80-110 F.2 and 9 VAC 5-80-250)

F. Failure/Malfunction Reporting

In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, as soon as practicable but no later than four daytime business hours, notify the Director, Piedmont Regional Office by facsimile transmission, telephone or telegraph of such failure or malfunction and shall within two weeks provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Director, Piedmont Regional Office.
(9 VAC 5-20-180 C)

G. Severability

The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.
(9 VAC 5-80-110 G.1)

H. Duty to Comply

The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
(9 VAC 5-80-110 G.2)

I. Need to Halt or Reduce Activity not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
(9 VAC 5-80-110 G.3)

J. Permit Modification

A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9 VAC 5-80-50, 9 VAC 5-80-1100, 9 VAC 5-80-1605, or 9 VAC 5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios.
(9 VAC 5-80-190 and 9 VAC 5-80-260)

K. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege.
(9 VAC 5-80-110 G.5)

L. Duty to Submit Information

1. The permittee shall furnish to the board, within a reasonable time, any information that the board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the board along with a claim of confidentiality.
(9 VAC 5-80-110 G.6)
2. Any document (including reports) required in a permit condition to be submitted to the board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G.
(9 VAC 5-80-110 K.1)

M. Duty to Pay Permit Fees

The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-305 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-355.
(9 VAC 5-80-110 H and 9 VAC 5-80-340 C)

N. Fugitive Dust Emission Standards

During the operation of a stationary source or any other building, structure, facility or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking

reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited, to the following:

1. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;
2. Application of asphalt, oil, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;
3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or other similar operations;
4. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and
5. The prompt removal of spilled or traced dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9 VAC 5-50-50)

O. Startup, Shutdown, and Malfunction

At all times, including periods of startup, shutdown, soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

(9 VAC 5-50-20)

P. Alternative Operating Scenarios

Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80 Article 1.

(9 VAC 5-80-110 J)

Q. Inspection and Entry Requirements

The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

1. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.

3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
4. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K.2)

R. Reopening For Cause

The permit shall be reopened by the board if additional federal requirements become applicable to a major source with a remaining permit term of three or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F.

1. The permit shall be reopened if the board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
2. The permit shall be reopened if the administrator or the board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
3. The permit shall not be reopened by the board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

(9 VAC 5-80-110 L)

S. Permit Availability

Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.

(9 VAC 5-80-150 E)

T. Transfer of Permits

1. No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.
(9 VAC 5-80-160)
2. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-160)
3. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-160)

U. Malfunction as an Affirmative Defense

1. A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the requirements of paragraph 2 of this condition are met.
2. The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:
 - a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.
 - b. The permitted facility was at the time being properly operated.
 - c. During the period of the malfunction the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.
 - d. The permittee notified the board of the malfunction within two working days following the time when the emission limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, or any other method that allows the permittee to comply with the deadline. This notification fulfills the requirements of 9 VAC 5-80-110 F 2 b to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirement under 9 VAC 5-20-180 C.
3. In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any requirement applicable to the source.
4. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any applicable requirement.

(9 VAC 5-80-250)

V. Permit Revocation or Termination for Cause

A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The board may suspend, under such conditions and for such period of time as the board may prescribe, any permit for any of the grounds for revocation or termination or for any other violations of these regulations.

(9 VAC 5-80-190 C and 9 VAC 5-80-260)

W. Duty to Supplement or Correct Application

Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal,

promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit. (9 VAC 5-80-80 E)

X. Stratospheric Ozone Protection

If the permittee handles or emits one or more Class I or II substance subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.
(40 CFR Part 82, Subparts A - F)

Y. Accidental Release Prevention

If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.
(40 CFR Part 68)

Z. Changes to Permits for Emissions Trading

No permit revision shall be required, under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.
(9 VAC 5-80-110 I)

AA. Emissions Trading

Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:

1. All terms and conditions required under 9 VAC 5-80-110 except subsection N shall be included to determine compliance.
2. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.
3. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.

(9 VAC 5-80-110 I)

X. Compliance Certification and Schedule

No Compliance Schedule has been included with this permit.

XI. Permit Shield

Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been explicitly deemed to be not applicable to this permitted facility:

Citation	Title of Citation	Description of applicability
40 CFR 60 Subpart Db	Standards of Performance for Commercial-Industrial-Institutional Steam Generating Units	For the purposes of 40 CFR 60, The Wellons/flake dryer system consists of one small (50 MMBtu/hr) steam generating unit (SGU) and one non-small (160 MMBtu/hr) SGU. The non-small SGU was constructed prior to the Subpart Db applicability date (June 19, 1984).
40 CFR 60 Subpart Dc	Standards of Performance for Small Commercial-Industrial-Institutional Steam Generating Units	For the purposes of 40 CFR 60, The Wellons/flake dryer system consists of one small (50 MMBtu/hr) SGU and one non-small (160 MMBtu/hr) SGU. The small SGU was constructed prior to the Subpart Dc applicability date (June 9, 1989).

Nothing in this permit shield shall alter the provisions of §303 of the Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by the (i) administrator pursuant to §114 of the Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.
(9 VAC 5-80-140)

Attachment A

COMPLIANCE ASSURANCE MONITORING PLAN FOR THE RTO USED TO CONTROL PM/PM-10, CO AND VOC EMISSIONS FROM THE WELLONS/FLAKE DRYER SYSTEM AT THE SKIPPERS, VA OSB PLANT TITLE V PERMIT NO. PRO50941

Compliance Assurance Monitoring (CAM) Rule

The CAM rule is essentially a companion rule to Title V, requiring that control device operating parameters be monitored in order to demonstrate compliance with a specified emission limitation or standard. At 40 CFR 64.2(a), the CAM rule states the following:

“...the requirements of this part shall apply to a pollutant-specific emissions unit at a major source that is required to obtain a part 70 or 71 permit if the unit satisfies all of the following criteria:

- (1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or surrogate thereof), other than an emission limitation or standard that is exempt under paragraph (b)(1) of this section;*
- (2) The unit uses a control device to achieve compliance with any such emission limitation or standard; and*
- (3) The unit has the potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source...”*

The CAM Rule defines two classes of emission units. These are “large pollutant-specific emissions units” and “other pollutant-specific emissions units”. The “large” units are those, “...with the potential to emit...taking into account control devices...the applicable regulated pollutant in an amount greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source...” The “other” units are those that are not “large” units. As such, the primary difference between the two categories is that “large” units are those that are still major (*i.e.*, greater than 100 percent of the major source threshold) after the application of controls, while the “other” units are those that are non-major (*i.e.*, less than or equal to 100 percent of the major source threshold) following the application of controls.

The federal regulations, at 40 CFR 64.5(a)(2), state the following with regard to submittal of a CAM Plan for “large pollutant-specific emissions units”:

“On or after April 20, 1998, the owner or operator shall submit information as part of an application for a significant permit revision under part 70 or 71 of this chapter, but only with respect to those pollutant-specific emissions units for which the proposed permit revision is applicable.”

The regulations, at 40 CFR 64.5(b), state the following with regard to submittal of a CAM Plan for the “other pollutant-specific emissions units”:

“...the owner or operator shall submit the information required...as part of an application for a renewal of a part 70 or part 71 permit.”

I. Background

A. Emissions Unit

Description: Wellons/OSB OSB Rotary Dryers
Manufacturer: Wellons/MEC
Capacity: 50 OD tons/hr
Facility: Skippers OSB
234 Forest Road
Skippers, VA 23879

B. Applicable Regulation, Emissions Limit, and Pre-CAM Monitoring Requirements

- The Skippers OSB plant is a Title V major source and has a Title V Permit, PRO50941.
- The Wellons/flake dryer system (Ref. #3000) is subject to existing Title V Permit limits. The Title V Permit was originally issued on January 12, 2003. The Regenerative Thermal Oxidizer (RTO) is the control device for the VOC, CO, and PM/PM-10 emissions generated in the Wellons/flake drying operation. It is utilized to achieve compliance with the VOC, CO, and PM mass emission limits.
- The pre-controlled, potential VOC, CO, and PM emission rates are above the Title V major source threshold of 100 tons/yr.

Current Emissions limit: 17.3 lbs/hr and 56.4 tons/yr VOC
20.6 lbs/hr and 66.8 tons/yr CO
23.1 lbs/hr and 73.9 tons/yr PM/PM-10

Current Monitoring Requirements: The retention chamber temperatures, outlet volumetric flows, ID fan inlet static pressures, and the isolation damper positions of each RTO are monitored continuously, except during periods when the dryers are not operating or during previously scheduled startup and shutdown periods (including bakeouts and washouts). The retention chamber temperature and outlet volumetric flow monitors record readings every 15 minutes and reduce those readings to 12-hour averages. The ID fan inlet static pressure monitors record readings every 15 minutes and reduce those readings to 12-hour averages. The isolation damper position monitors record readings when a change of damper position occurs.

C. Control Technology, Capture system, Bypass, Potential-to-Emit

Controls: Regenerative Thermal Oxidizer (RTO)
Capture System: Closed Duct System
Bypass: In the event of a malfunction, the dryer exhaust gases can be bypassed. However, during such periods, the process control function interlocks and will not allow processing of additional flakes until the bypass condition is eliminated. Periods of bypass are documented and reported as necessary.
PTE Before Control: > 100 tpy for VOC, CO, and PM/PM-10
PTE After Control: 17.3 lbs/hr and 56.4 tons/yr VOC (permit limit)
20.6 lbs/hr and 66.8 tons/yr CO (permit limit)
23.1 lbs/hr and 73.9 tons/yr PM/PM-10 (permit limit)

II. Monitoring/Maintenance Approach

- A. Indicators: The RTO serves as the control device for VOC, CO, and PM emissions generated during the combustion/drying process. Thermal incineration of the VOC, CO, and PM occurs given sufficient temperature and residence time. Since residence time is fixed by the physical size of the equipment involved and the flow rate of exhaust gases, temperature would be the appropriate indicator parameter to monitor. However, our Title V permit requires that we monitor airflow as well. As such we propose to continue monitoring airflow and temperature as the indicator parameters to assess the effectiveness of the control system.
- B. Monitoring/Measurement Approach: For the RTOs at Skippers we currently monitor two types of parameters. These are compliance control parameters, which are used to assure maintenance of compliance and operational status indicators, which are used solely as an aid to the facility in anticipating maintenance needs and documenting operation.

Based on performance tests and parametric monitoring results obtained with the current monitoring approach, continued monitoring of the compliance control parameters (firebox (combustion chamber) temperatures and outlet volumetric flows), and the operational status indicators (ID fan inlet static pressures and the isolation damper positions of each RTO), is considered sufficient to document continuous compliance with the emission limits.

As such, except during periods when the dryers are not operating or during previously scheduled startup and shutdown periods (including bakeouts and washouts), we will continue to monitor and record the firebox (combustion chamber) temperature every 15 minutes and reduce those readings to 3-hour averages as required by the PCWP MACT. We will continue to monitor and record the outlet volumetric flow monitor readings every 15 minutes and reduce those readings to 12-hour averages as required by the Title V permit. The ID fan inlet static pressure monitors will record readings every 15 minutes and reduce those readings to 12-hour averages. The isolation damper position monitors will record readings when a change of damper position occurs.

The RTOs are equipped with a Programmable Logic Controller (PLC), with the capability of controlling and monitoring the compliance control and operational status indicator parameters. Recordkeeping and reporting of these compliance control and operational status indicator parameters will be managed using a dedicated computer equipped with a relational database (such as Wonderware's Industrial SQL Server Software) that will serve as the Data Acquisition System (DAS).

- C. Indicator Range: The minimum firebox (combustion chamber) temperature and the maximum airflow were established based on the average firebox (combustion chamber) temperature and the maximum airflow at which the unit was operating during a performance test where compliance with the emission limits was demonstrated. The firebox (combustion chamber) temperature and outlet volumetric flow monitor readings are recorded every 15 minutes and reduce those readings are reduced to 3-hour and 12-hour block averages, respectively. An appropriate averaging period lessens the impact to normal process variability. The minimum firebox (combustion chamber) temperature is established based on performance testing conducted pursuant to the PCWP MACT requirements contained in Condition #64 of this permit. The maximum airflow value is established during each compliance demonstration conducted pursuant to Condition #16 of this permit.
- D. Performance Criteria:

Data Representativeness:

The data for determining the indicator range is developed from onsite stack tests during which compliance with the emission limits was demonstrated. The average combustion chamber temperature during normal operations will be maintained above the proposed

minimum. The outlet airflow will be maintained below the maximum airflow rate measured during the most recent compliance test.

Verification of Operational Status

The RTO is equipped with a Programmable Logic Controller (PLC), with the capability of controlling and monitoring the compliance control and operational status indicator parameters.

QA/QC Practices and Criteria:

Multiple temperature probes are utilized to ensure accurate readings. Validation of temperature probes are conducted semi-annually. A relative accuracy test audit (RATA) is conducted on the airflow measurements devices during the biennial performance test.

Monitoring Frequency:

Temperature and airflow measurements are documented at least every 15 minutes from data collected during this period.

Data Collection Procedures:

Recordkeeping and reporting the compliance control and operational status indicator parameters is managed using a computerized Data Acquisition System (DAS).

Averaging Period:

Temperature data is averaged over a 3-hour block period based on data collected at least every 15 minutes. Airflow data is averaged over a 12-hour block period based on data collected at least every 15 minutes.

Excursion:

A 3-hour block average value below the minimum firebox (combustion chamber) temperature or a 12-hour block average above the maximum airflow value.

III. Response to Excursion

During normal operation, if the average firebox (combustion chamber) temperature falls below the minimum requirement or the measured airflow exceeds the maximum, an investigation ensues to determine the cause of the problem and correct the problem as soon as practicable.

JUSTIFICATION

I. Rationale for Selection of Performance Indicators

Thermal incineration of the PM, CO, and VOC occurs given sufficient temperature and residence time. Since residence time is fixed by the physical size of the equipment involved and the flow rate of exhaust gases, temperature would be the appropriate indicator parameter to monitor. However, our Title V permit requires that we monitor airflow as well. As such we propose to continue monitoring airflow and temperature as the indicator parameters to assess the effectiveness of the control system.

II. Rationale for Selection of Indicator Ranges

The indicator parameters was/will be selected based on emission test data generated under normal operations at which compliance with the emission limits was demonstrated.

Attachment B

COMPLIANCE ASSURANCE MONITORING PLAN FOR THE RCO/RTO USED TO CONTROL VOC EMISSIONS FROM THE BOARD PRESS AT THE SKIPPERS, VA OSB PLANT TITLE V PERMIT NO. PRO50941

Compliance Assurance Monitoring (CAM) Rule

The CAM rule is essentially a companion rule to Title V, requiring that control device operating parameters be monitored in order to demonstrate compliance with a specified emission limitation or standard. At 40 CFR 64.2(a), the CAM rule states the following:

“...the requirements of this part shall apply to a pollutant-specific emissions unit at a major source that is required to obtain a part 70 or 71 permit if the unit satisfies all of the following criteria:

- (1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or surrogate thereof), other than an emission limitation or standard that is exempt under paragraph (b)(1) of this section;*
- (2) The unit uses a control device to achieve compliance with any such emission limitation or standard; and*
- (3) The unit has the potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source...”*

The CAM Rule defines two classes of emission units. These are “large pollutant-specific emissions units” and “other pollutant-specific emissions units”. The “large” units are those, “...with the potential to emit...taking into account control devices...the applicable regulated pollutant in an amount greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source...” The “other” units are those that are not “large” units. As such, the primary difference between the two categories is that “large” units are those that are still major (*i.e.*, greater than 100 percent of the major source threshold) after the application of controls, while the “other” units are those that are non-major (*i.e.*, less than or equal to 100 percent of the major source threshold) following the application of controls.

The federal regulations, at 40 CFR 64.5(a)(2), state the following with regard to submittal of a CAM Plan for “large pollutant-specific emissions units”:

“On or after April 20, 1998, the owner or operator shall submit information as part of an application for a significant permit revision under part 70 or 71 of this chapter, but only with respect to those pollutant-specific emissions units for which the proposed permit revision is applicable.”

The regulations, at 40 CFR 64.5(b), state the following with regard to submittal of a CAM Plan for the “other pollutant-specific emissions units”:

“...the owner or operator shall submit the information required...as part of an application for a renewal of a part 70 or part 71 permit.”

I. Background

A. Emissions Unit

Description: OSB Press
Manufacturer: Siempelkamp
Capacity: 57 MSF/hr (3/8" Basis)
Facility: Skippers OSB
234 Forest Road
Skippers, VA 23879

B. Applicable Regulation, Emissions Limit, and Pre-CAM Monitoring Requirements

- The Skippers OSB plant is a Title V major source and has a Title V Permit, PRO50941.
- The Press (Ref. #5000) is subject to existing Title V Permit limits. The Title V Permit was originally issued on January 12, 2003.
- The Regenerative Catalytic Oxidizer (RCO)/Regenerative Thermal Oxidizer (RTO) is the control device for the VOC emissions generated in the board pressing operation. It is utilized to achieve compliance with the VOC mass emission limits.
- The pre-controlled, potential VOC emission rate is above the Title V major source threshold of 100 tons/yr.

Current Emissions limit: 5.3 lbs/hr and 18.6 tons/yr VOC

Current Monitoring Requirements: None

C. Control Technology, Capture system, Bypass, Potential-to-Emit

Controls: Regenerative Catalytic Oxidizer (RCO); Regenerative Thermal Oxidizer (RTO)

Capture System: Closed Duct System

Bypass: In the event of a malfunction, the press exhaust can be bypassed for a limited time to clear the existing load from the press. However, during such periods, the process control function interlocks and will not allow processing of additional press loads until the bypass condition is eliminated. Periods of bypass are documented and reported as necessary.

PTE Before Control: 52.8 lbs/hr or 184.8 tons/yr VOC (based on control efficiency of 90% with post control potential emissions as indicated below)

PTE After Control: 5.3 lbs/hr and 18.6 tons/yr VOC (emission limit)

II. Monitoring/Maintenance Approach

- A. Indicators: The RCO/RTO serves as the control device for VOC emissions generated during the board pressing operation. Thermal incineration of the VOC occurs given sufficient temperature and residence time. Catalytic incineration of VOC also occurs given sufficient catalytic activity, temperature, and residence time. Since residence time is fixed by the physical size of the equipment involved and the flow rate of exhaust gases, temperature (during thermal operation) and temperature plus catalyst activity (during catalytic operation) would be the appropriate indicator parameters to monitor.
- B. Monitoring/Measurement Approach: The PCWP MACT requires continuous monitoring of the firebox (combustion chamber) temperature along with annual catalytic activity checks (used to assess the activity of the catalyst) when the unit is being operated in catalytic mode and continuous monitoring of the firebox (combustion chamber) temperature when the unit is operated

in thermal mode. As such, this firebox (combustion chamber) temperature will be monitored and used as the indicator parameter.

The RCO/RTO is equipped with a Programmable Logic Controller (PLC), with the capability of controlling and monitoring the indicator parameter. Recordkeeping and reporting of the indicator parameter is managed using a computerized Data Acquisition System (DAS). Temperature measurements are documented every 15 minutes. This data is averaged over a 3-hour block period. The 3-hour block average is the value used to verify compliance with the minimum firebox (combustion chamber) temperature established during the performance test conducted pursuant to the PCWP MACT requirements contained in Condition #64 of this permit.

- C. Indicator Range: The minimum firebox (combustion chamber) temperature is established based on the average firebox (combustion chamber) temperature at which the unit was operating during the performance testing conducted pursuant to the PCWP MACT requirements contained in Condition #64 of this permit. The averaging period for the indicator parameter is also based on the compliance test period, 3-hour block average based on data collected at least once every 15-minutes. An appropriate averaging period lessens the impact to normal process variability.

D. Performance Criteria:

<u>Data Representativeness:</u>	The data for determining the proposed indicator range was developed from onsite stack tests. The firebox (combustion chamber) temperature during normal operations is maintained above the proposed minimum.
<u>Verification of Operational Status:</u>	The RCO/RTO is equipped with a Programmable Logic Controller (PLC), with the capability of controlling and monitoring the temperature.
<u>QA/QC Practices and Criteria:</u>	Multiple temperature probes are utilized to ensure accurate readings. Validation of temperature probes are conducted semi-annually.
<u>Monitoring Frequency:</u>	Temperature measurements are documented at least every 15 minutes from data collected during this period.
<u>Data Collection Procedures:</u>	Recordkeeping and reporting of this indicator parameter is managed using a dedicated computer equipped with a computerized Data Acquisition System (DAS).
<u>Averaging Period:</u>	Temperature data is averaged over a 3-hour block period based on data collected at least every 15 minutes.
<u>Excursion:</u>	A 3-hour block average value below the minimum firebox (combustion chamber) temperature.

III. Response to Excursion

During normal operation, if the average firebox (combustion chamber) temperature falls below the minimum requirement, the press is shutdown until the temperature excursion can be corrected. In addition, if any other alarms/conditions exist that result in the unit being shutdown, the process function is interlocked such that the press can not operate until these alarms have been cleared and the average firebox (combustion chamber) temperature is above the minimum temperature established during compliance testing.

JUSTIFICATION

I. Rationale for Selection of Performance Indicators

Thermal incineration of the VOC occurs given sufficient temperature and residence time. Catalytic incineration of VOC also occurs given sufficient catalytic activity, temperature, and residence time. Since residence time is fixed by the physical size of the equipment involved, temperature (during thermal operation) and temperature plus catalyst activity (during catalytic operation) would be the appropriate indicator parameters to monitor.

II. Rationale for Selection of Indicator Ranges

The indicator parameter was/will be selected based on emission test data generated under normal operations at which compliance with the emission limits was demonstrated.

Attachment C

COMPLIANCE ASSURANCE MONITORING PLAN FOR THE FABRIC FILTERS USED TO CONTROL PM/PM-10 EMISSIONS FROM VARIOUS MANUFACTURING OPERATIONS AT THE SKIPPERS, VA OSB PLANT TITLE V PERMIT NO. PRO50941

Compliance Assurance Monitoring (CAM) Rule

The CAM rule is essentially a companion rule to Title V, requiring that control device operating parameters be monitored in order to demonstrate compliance with a specified emission limitation or standard. At 40 CFR 64.2(a), the CAM rule states the following:

“...the requirements of this part shall apply to a pollutant-specific emissions unit at a major source that is required to obtain a part 70 or 71 permit if the unit satisfies all of the following criteria:

- (1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or surrogate thereof), other than an emission limitation or standard that is exempt under paragraph (b)(1) of this section;*
- (2) The unit uses a control device to achieve compliance with any such emission limitation or standard; and*
- (3) The unit has the potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source...”*

The CAM Rule defines two classes of emission units. These are “large pollutant-specific emissions units” and “other pollutant-specific emissions units”. The “large” units are those, “...with the potential to emit...taking into account control devices...the applicable regulated pollutant in an amount greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source...” The “other” units are those that are not “large” units. As such, the primary difference between the two categories is that “large” units are those that are still major (*i.e.*, greater than 100 percent of the major source threshold) after the application of controls, while the “other” units are those that are non-major (*i.e.*, less than or equal to 100 percent of the major source threshold) following the application of controls.

The federal regulations, at 40 CFR 64.5(a)(2), state the following with regard to submittal of a CAM Plan for “large pollutant-specific emissions units”:

“On or after April 20, 1998, the owner or operator shall submit information as part of an application for a significant permit revision under part 70 or 71 of this chapter, but only with respect to those pollutant-specific emissions units for which the proposed permit revision is applicable.”

The regulations, at 40 CFR 64.5(b), state the following with regard to submittal of a CAM Plan for the “other pollutant-specific emissions units”:

“...the owner or operator shall submit the information required...as part of an application for a renewal of a part 70 or part 71 permit.”

I. Background

A. Emissions Unit

Description: See Table Below
Facility: Skippers OSB
234 Forest Road
Skippers, VA 23879

<u>Ref. #</u>	<u>Stack ID</u>	<u>Process/Equipment Description</u>
6100	12	Panel Sanding/Tongue & Groove
5100	13	Forming & Finishing End Pickups
9100	14a	General Plant Dedusting - System A
9200	14b	General Plant Dedusting - System B
3100	15	Screen Fines Transfer
3200	16	Dry Waste Transfer
5200	17	Mat Reject System
3300	18	Sanderdust/Hog Fuel Transfer/Storage
3400	19	Grit Fines Transfer
3500	20	Fuel Screen Fines Storage Bin/MEC Raw Fuel Transfer System
3600	21	Dry Fuel Hammermill/MEC Prepared Fuel Transfer System

B. Applicable Regulation, Emissions Limit, and Pre-CAM Monitoring Requirements

With regard to the four criteria listed above for a facility to be subject to the CAM rule, the following facts pertain to the Skippers OSB Plant:

- The Skippers OSB plant is a major source and has a Title V Permit, PRO50941.
- The various pneumatic systems (see above) are subject to existing Title V Permit limits. The Title V Permit was originally issued on January 12, 2003.
- The process equipment utilizes a control device (fabric filter) to achieve compliance with the particulate matter and opacity emission limits.
- The pre-controlled, potential PM/PM-10 emission rate is above the major source level of 100 tons per year.

Based on these facts, the emission units are subject to the CAM requirements for particulate matter.

CAM Emissions limit: See Emission Limit Table below

Pre-CAM Monitoring Requirements: Weekly visible emissions observations.

<u>Process/Equipment Description</u>	PM/PM-10 Emission Limits		
	<u>gr/dscf</u>	<u>lbs/hr</u>	<u>tons/yr</u>
Panel Sanding/Tongue & Groove	0.01	3.8	16.0
Forming & Finishing End Pickups	0.01	2.4	10.2
General Plant Dedusting - System A	0.01	3.1	13.1
General Plant Dedusting - System B	0.01	2.6	11.1
Screen Fines Transfer	0.01	0.5	0.9
Dry Waste Transfer	0.01	0.5	1.9
Mat Reject System	0.01	3.6	15.2
Sanderdust/Hog Fuel Transfer/Storage	0.01	0.5	1.7
Grit Fines Transfer	0.01	0.5	0.5
Fuel Screen Fines Storage Bin	0.01	0.5	1.0
Dry Fuel Hammermill	0.01	1.0	4.4

C. Control Technology, Capture system, Bypass, Potential-to-Emit

Controls: Fabric Filter

Capture System: Closed Duct System

Bypass: In the event of a startup, shutdown, or malfunction, the fabric filter could be bypassed. Periods of bypass are documented and reported as necessary.

PTE Before Control: >major source thresholds for PM/PM-10

PTE After Control: 0.01 gr/dscf (See above emission limits)

II. Monitoring Approach

- A. Indicators: Fabric filter performance is monitored through the use of visible emissions observations. The presence of any visible emissions from a properly maintained and operating fabric filter is an appropriate indicator that a bag rupture or leak is occurring and that corrective action is necessary.
- B. Measurement Approach: A trained employee familiar with normal process operations and the appearance of the exhaust from these sources will be responsible for observing and recording visible emissions observations using Method 22 like procedures (for at least 1 minute) on a daily basis when the pneumatic system is operating.
- C. Indicator Range: The presence of visible emissions would be considered an excursion that requires corrective action.

D. Performance Criteria:

<u>Data Representativeness</u>	The presence of any visible emissions from a properly maintained and operating fabric filter is an appropriate indicator that a bag rupture or leak is occurring and that corrective action is necessary.
<u>Verification of Operational Status</u>	Not Applicable
<u>QA/QC Practices and Criteria</u>	The observer will be familiar with Method 22 and will follow Method 22 like procedures when conducting the observation.
<u>Monitoring Frequency</u>	The exhaust from the fabric filter will be observed on a daily basis using Method 22 like procedures for at least 1 minute.
<u>Data Collection Procedures</u>	Visible emissions observations will be maintained in either an electronic or written format.
<u>Averaging Period</u>	Not Applicable
<u>Excursion</u>	The presence of visible emissions.

III. Response to Excursion

During normal operation, the presence of visible emissions indicates fabric filter performance issues that require corrective actions. During such events, an investigation will be initiated to determine the cause of the excursion and corrective actions taken as soon as practicable to correct the cause of the excursion. All excursions will be documented and reported as necessary. A quality improvement plan (QIP) will be developed upon experiencing 2 excursions in a 2 week period.

JUSTIFICATION

I. Background

The pollutant specific emissions units (PSEU E-O) are the various pneumatic wood material transfer systems which use a fabric filter to control particulate emissions from the manufacturing operations.

II. Rationale for Selection of Performance Indicators

The CAM indicator selected is the presence of visible emissions in the fabric filter exhaust. The presence of visible emissions was selected as the performance indicator since a properly operating fabric filter should result in no visible emissions present in the exhaust. Presence of no visible emissions should provide reasonable assurance of compliance with the emission limits.

III. Rationale for Selection of Indicator Ranges

The presence of no visible emissions is indicative of an intact and properly operating fabric filter. A properly operating fabric filter should provide reasonable assurance of compliance with the emission limits.

